

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

GMS INDUSTRIAL SUPPLY, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-cv-324-RCY-LRL
)	
G&S SUPPLY, LLC, et al.,)	
)	
Defendants.)	

**DEFENDANTS' MOTION
FOR SANCTIONS PURSUANT TO RULE 11**

NOW COME Defendants G&S Supply, LLC, WarTech Industries, LLC, HMC Supply, LLC, Defendants/Counterclaimants Westly Greer, Sabrina Greer, Greer Group, LLC, Gregory K. Spires, County Roads, LLC, Thomas Hayes, and Mike Welton (collectively "Defendants"), by counsel, pursuant to Rule 11 of the Federal Rules of Civil Procedure, and hereby move this Court for entry of an order dismissing this case with prejudice. In support of this Motion, Defendants refer the Court to their Memorandum in Support, filed contemporaneously herewith.

WHEREFORE, for the reasons stated in the accompanying Memorandum in Support of this Motion for Protective Order, Defendants respectfully request this Court (1) grant their Motion for Sanctions and dismiss Plaintiff's Third Amended Complaint with prejudice; (2) award Defendants their costs and expenses, including attorneys' fees in defending this suit and bringing this Motion for Sanctions; (3) and awarding such further relief as the Court deems appropriate.

Dated: July 8, 2021

Respectfully submitted,

**G&S SUPPLY, LLC, WESTLY L. GREER,
SABRINA GREER, GREER GROUP, LLC,
GREGORY K. SPIRES, COUNTY ROADS,
LLC, THOMAS HAYES, MIKE WELTON,
WARTECH INDUSTRIES, LLC AND HMC
SUPPLY, LLC**

By: /s/ Robert W. McFarland

Robert W. McFarland (VSB # 24021)

V. Kathleen Dougherty (VSB # 77294)

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Counsel for Defendants and Counterclaim Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2021, I filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

By: /s/ Robert W. McFarland
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V. Kathleen Dougherty (VSB # 77294)
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